Wegmans Consumer Affairs

December 17, 2002

Livestock and Seed Programs
Agriculture Marketing Service
U.S. Department of Agriculture
Stop 0249, Room 2092-S
Washington, DC 20250-0249

To Whom It May Concern:

This letter is written to strongly support the introduction of irradiated foods, especially irradiated ground beef, as an additional option in the National School Lunch Program. Here are some facts to consider:

- This preservation technology has been extensively studied. The studies have included multiple generations. The approval process includes radiological, toxicological, microbiological and nutritional effects of food irradiation. I would suggest a look at the 1995 edition of Diehl's "Safety of Irradiated Foods" for outstanding reviews of food irradiation research.

- Food irradiation is endorsed by all leading health organizations including the World Health Organization, the American Medical Association, the American Dietetic Association, the American Council on Science & Health and has received the approval FDA, following the rigorous food additive petition process.

- There is consumer acceptance of irradiated ground beef in the marketplace. Even when 'Irradiated' is featured prominently in the product name. Wegmans has experience with acceptance of the product and we would be happy to share our experiences with the review committee.

- USDA **does not** reduce sanitation standards for products to be irradiated. The strict sanitation remain, the irradiation is an additional step to protect the public.

As the parent of a seven-year-old child, I encourage the USDA to move forward with food irradiation as an additional food safety option in the school lunch program.

I am also including an excerpt from Agricultural Research magazine and strongly urge you to consider the research of Dr. Donald Thayer in making your decision. I also encourage you to consider the endorsement of Dr. Robert Tauxe at the Centers for Disease Control and Prevention and his assessment of the impact food irradiation can have on public health with the substantial decrease in foodborne illness.

Sincerely,

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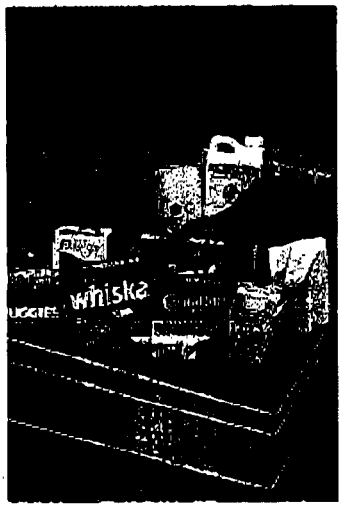
...From the pages of *Agricultural Research* magazine

For You, the Consumer



Abundant, affordable, safe, vast variety—it's the American way when it comes to shopping. What isn't found on any store shelf is an Agricultural Research Service brand name. But many products that people use every day could justifiably carry the stamp "Courtesy of ARS Research." Pharmaceuticals, cosmetics, roach and termite controls, leather, shampoos, and processed foods, not to mention a proverbial cornucopia of fruits, vegetables, berries, meats, and nuts, all come to a store near you by way of ARS laboratories. Of course, there are essential stops along the way for technology transfer to the companies that turn out the actual products.

But without the work that ARS invests in research—often long-term, high-risk research—there are whole industries of products that might never have gotten off the

ground. Some products make it tastier to balance your diet. Some keep you warm and fashionable. Some improve recreation and athletics, and others keep you safe and healthy.

One product in that last category of safety and health to which consumers now have access as a result of ARS research is irradiated hamburger free of *Escherichia coli* O157:H7, bacteria that can cause serious, even life-threatening illness. Ground beef is especially vulnerable because more than just the surface of the meat may potentially have been exposed to bacterial contamination.

The term "irradiated" refers to treatment with ionizing radiation from gamma rays produced by cobalt and cesium atoms, machine-produced X-rays, or electron beams. Treated meat in no way becomes radioactive. Omaha Steaks, for example, began offering irradiated hamburger patties and ground beef in November 2000. Today, all the

6.5 million pounds of ground beef they sell each year in their retail and bulk food service operations is irradiated.

Bruce Simon, president of Omaha Steaks, feels strongly that, with irradiation, research has developed a way to provide consumers with an extra measure of food safety for ground beef. "We know we were among the first beef companies to make use of irradiation. Whenever we can add another safeguard to make sure that there is less possibility that anyone, especially a child, could be exposed to *E. coli*, it's a step we just have to take," Simon explains.

Consumers won't see ARS' name where it says "Treated by Irradiation" on Omaha Steaks' hamburger packaging. But much of the research to prove irradiation an effective and safe method to sanitize ground beef came from the laboratory headed by ARS microbiologist Donald W. Thayer. "When you look at the docket that

was submitted to the Food and Drug Administration and the Food Safety and Inspection Service to get approval for irradiation of red meat, many of the papers they cite are from ARS," Thayer says. Final approval for irradiation treatment of meat came in February 2000.